

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554

In the Matter of)	
)	
Request for Review of the)	CC Docket No. 02-6
)	CC Docket No. 96-45
Decision of the)	File No. _____
Universal Service Administrative Company)	
By)	
)	
Hamilton Clermont Cooperative Association of)	
Boards of Education ("HCCA"))	
SPIN # 143024403)	

REQUEST FOR REVIEW

Pursuant to Section 54.719(c) of the Rules of the Federal Communication Commission ("Commission"), Hamilton Clermont Cooperative Association of Boards of Education ("HCCA"), respectfully requests review of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company's ("USAC") October 24, 2006 Funding Commitment Decision Letter ("FCDL") (Attached as Exhibit A) denying funding for FCC Form 470 # 467190000481691 ("Form 470"), (Attached as Exhibit B) and associated Form 471 #499117 (Attached as Exhibit C) and Funding Request Number ("FRN") 1373755 for Funding Year 2006 (07/01/2006 – 06/30/2007). As will be shown below, the SLD: (1) without consent and in violation of the FCC's rules and regulations, reclassified the voicemail services applied for in Block 2, Item 9 of the abovementioned Form 470 from an internet access service to a telecommunications service; and (2) then denied funding because the Form 470 did not include a request for telecommunications services.

On December 12, 2003 Winton Woods City School District ("Winton Woods") posted Form 470 # 467190000481691 requesting in the Internet Access category, located in block 2,

item 9, quotations for Internet service, email accounts and services and voice mail services. On January 12, 2004 Winton Woods awarded HCCA, an Internet service provider, a four-year contract for the above-mentioned services. On January 25, 2006 USAC sent a Form 471 Receipt Acknowledgement Letter for the 2006 funding year, identifying FRN 1373755 as the relevant FRN for voice mail service for the 2006 funding year. On July 27, 2006 Winton Woods received a Program Integrity Assurance (“PIA”) inquiry via fax from Adrian Sewdat of the SLD. Mr. Sewdat’s PIA inquiry contained only one question: “Please provide more detailed documentation that identifies the actual products and services being requested... to support \$3030/MO.”¹ One day later, on July 28, 2006, Winton Woods replied describing the services as “voicemail service for 520 voicemail accounts that allow users to receive voice messages left by callers via email/internet access as well as basic phone voice mail access.”²

To the best of our knowledge, no further investigation was performed by the SLD. HCCA was never contacted, and although Winton Woods was contacted by Mr. Sewdat regarding another FRN also associated with the Form 471 (499117), Winton Woods did not receive any further inquiries regarding FRN 1373755. Then on October 24, 2006 HCCA received a FCDL (Attached as Exhibit A). The FCDL denied in full all funding associated with FRN 1373755. The only explanation provided was that:

the category of service was changed from Internet Access to Telecom Services in accordance with program rules. The 470 cited did not include service of this type; therefore it does not meet the 28 day competitive bidding requirement.³

As discussed below the SLD’s decision is contrary to law and policy. The SLD’s reasoning is contrary to the definition of voicemail services listed in the 2006 Eligible Services

¹ See PIA inquiry from Mr. Adrian Sewdat dated July 27, 2006, Attached as Exhibit D.

² See reply to July 27, 2006 PIA inquiry from Rhonda Hobbs dated July 28, 2006, Attached as Exhibit E.

³ See FCDL, Attached as Exhibit A.

list, inconsistent with FCC rules and not authorized by the Administrative Procedures list issued by the SLD in October of 2006 governing the administrative procedures “that are currently used to lead to Schools and Libraries program funding decisions that are not explicitly stated in a Commission regulation.”

The 2006 Eligible Services List defines Voice Mail Service as

... an information service that allows users to receive voice messages left by telephone callers, and may have other features such as message forwarding. ... [V]oice mail services provided for one or more telephone lines are eligible for discount. Voice mail service need not be provided by a telecommunications carrier to be eligible. Voice mail service may be requested in either the Telecommunications Services category of service (if the service provider is a telecommunications carrier) or the Internet Access category of service (for any service provider) ...

HCCA is an Internet service provider. Based on the 2006 Eligible Services List, HCCA is permitted to provide voice mail service under the Internet Access category of service as permitted under the definition for voice mail services listed in the 2006 Eligible Services List. Furthermore, Winton Woods’ description of their voice mail service in their July 28, 2006 reply to the PIA inquiry is consistent with the 2006 Eligible Services List definition of voice mail service because HCCA’s service as described in Winton Woods’ reply to the SLD’s PIA inquiry “allow[s] users to receive voice messages left by callers.” Therefore, there was no legitimate reason for the SLD to reclassify the request as a request for Telecommunications Services.

Neither the Administrative Procedures list issued by the SLD in October of 2006 governing the administrative procedures “that are currently used to lead to Schools and Libraries program funding decisions that are not explicitly stated in a Commission regulation” nor any Commission regulation provided the SLD with the authority to change the category of service of a filed 470 without the consent of the applicant. Pursuant to the FCC’s recent decisions in

Bishop Perry Middle School (FCC 06-54, released May 19, 2006) and *Henkels & McCoy Inc.* (DA 06-1463, released July 19, 2006) when the SLD is confronted with procedural issues or questions regarding the eligibility of services, the FCC has directed the SLD not to reject the application for E-rate discounts outright but to “conduct a more detailed inquiry to determine whether the products or services were eligible.”⁴ Here, the SLD asked one question on July 27, 2006 and without further inquiry denied funding almost five months later on October 24, 2006. The SLD, absent any finding of waste, fraud or abuse consistent with 47 C.F.R. § 54.702(g), failed to conduct a further inquiry and overstepped its authority by changing the service category on Winton Woods’ Form 470 application which resulted in the denial of funding.

Denial of funding in this case would be inconsistent with the statutory goal of the E-rate program mandated by Congress of preserving and advancing universal service among schools and libraries most in need of support.⁵ Even if there was an ineligible component to HCCA’s voice mail service, denial of the entire funding request without further inquiry as required under *Bishop Perry* and *Henkels & McCoy* was too harsh and inconsistent with the program’s statutory goal.

Conclusion

It was an error for the SLD to deny funding to FRN 1373755 because: (1) Winton Woods filed a correct and valid Form 470 for voice mail services under the internet access category as permitted by the 2006 Eligible Services List; (2) Winton Woods’ voice mail service is consistent with the 2006 Eligible Services List; (3) Winton Woods provided, in a timely manner, all

⁴ *In the Matter of Request for Review of the Decision of the Universal Service Administrator by Henkels & McCoy, Inc., Little Rock School District, Little Rock, Arkansas*, DA-06-1463, at para. 7.

⁵ *In the Matter of Request for Review and/or Waiver of the Decision of the Universal Service Administrator by Glendale Unified School District, Glendale, California*, DA-06-244, at para. 5.

information requested by the SLD; (4) there is no factual or legal basis for the SLD's change of category of service from Internet Access to Telecom Services and (5) denial of funding would be contrary to the purpose of the E-rate program.

Therefore, HCCA respectfully requests that the Commission grant this Request for Review and remand the FCDL and order that the SLD erred in its decision to deny funding and direct the SLD to approve funding for FRN 1373755.

Respectfully submitted,

HAMILTON-CLERMONT COOPERATIVE
ASSOCIATION OF BOARDS OF EDUCATION

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Its Attorneys

December 22, 2006

EXHIBIT A



Universal Service Administrative Company
Schools & Libraries Division

FUNDING COMMITMENT DECISION LETTER
(Funding Year 2006: 07/01/2006 - 06/30/2007)

October 24, 2006

Rhonda Hobbs
WINTON WOODS CITY SCH DISTRICT
825 Waycross Road
CINCINNATI, OH 45240-1617

Case #
21-489882

Re: Form 471 Application Number: 499117
Billed Entity Number (BEN): 129887
Billed Entity FCC RN: 0002993525
Applicant's Form Identifier: 0607-INTER

Thank you for your Funding Year 2006 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$25,754.98 is "Approved."
- The amount, \$18,543.60 is "Denied."

Please refer to the Report on the page following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file Form 486 (Receipt of Service Confirmation Form). A guide that provides a definition for each line of the Report precedes the Report.

A list of Important Reminders and Deadlines is included with this letter to assist you throughout the application process.

NEXT STEPS

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full
- Review technology planning approval requirements
- Review CIPA requirements
- File Form 486
- Invoice USAC using the Form 474 (service provider) or Form 472 (Billed Entity) - as products and services are being delivered and billed

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and (if available) email address for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing:
 - Appellant name,
 - Applicant name and service provider name, if different from appellant,
 - Applicant BEN and Service Provider Identification Number (SPIN),
 - Form 471 Application Number 499117 as assigned by USAC,
 - "Funding Commitment Decision Letter for Funding Year 2006," AND
 - The exact text or the decision that you are appealing.

3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
5. Provide an authorized signature on your letter of appeal.

To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal
Schools and Libraries Division - Correspondence Unit
100 South Jefferson Road
P.O. Box 902
Whippany, New Jersey 07981

While we encourage you to resolve your appeal with USAC first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted in the Reference Area of our website. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

NOTICE ON RULES AND FUNDS AVAILABILITY

An applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division
Universal Service Administrative Company

*all
SLD
directly*

A GUIDE TO THE FUNDING COMMITMENT REPORT

A report for each funding request in your application is attached to this letter. We are providing the following definitions for the items in that report.

FORM 471 APPLICATION NUMBER: The unique identifier assigned to a Form 471 application by USAC.

FUNDING REQUEST NUMBER (FRN): A Funding Request Number is assigned by USAC to each Block 5 of your Form 471. This number is used to report to applicants and service providers the status of individual funding requests submitted.

FUNDING STATUS: Each FRN will have one of the following statuses:

1. "Funded" - the FRN is approved for support. The funding level will generally be the level requested unless USAC determined during the application review process that some adjustment is appropriate.
2. "Not Funded" - the FRN is one for which no funds were committed. The reason for the decision will be briefly explained in the "Funding Commitment Decision Explanation." An FRN may be "Not Funded" because the request does not comply with program rules, or because the total amount of funding available for the Funding Year was insufficient to fund all requests.
3. "As Yet Unfunded" - a temporary status assigned to an FRN when USAC is uncertain at the time the letter is sent about whether sufficient funds exist to make commitments for requests for Internal Connections Other than Basic Maintenance or Basic Maintenance of Internal Connections at a particular discount level. For example, if your application included requests for discounts on both Telecommunications Services and Internal Connections, you might receive a letter with funding commitments for your Telecommunications Services funding requests and with an "As Yet Unfunded" status on your Internal Connections requests. You would receive one or more subsequent letters regarding the funding decisions on your Internal Connections requests.

CATEGORY OF SERVICE: The type of service ordered from the service provider, as shown on your Form 471.

FORM 470 APPLICATION NUMBER: The Form 470 Application Number associated with this FRN from Block 5, Item 12 of the Form 471.

SPIN (Service Provider Identification Number): A unique number assigned by USAC to service providers seeking payment from the Universal Service Fund Programs. A SPIN is also used to verify delivery of services and to arrange for payment.

SERVICE PROVIDER NAME: The legal name of the service provider.

CONTRACT NUMBER: The number of the contract between the eligible party and the service provider, if a contract number was provided on your Form 471.

BILLING ACCOUNT NUMBER: The account number that your service provider has established with you for billing purposes, if a Billing Account Number was provided on your Form 471.

SERVICE START DATE: The Service Start Date for this FRN from Block 5, Item 19 of your Form 471.

CONTRACT EXPIRATION DATE: The Contract Expiration Date for this FRN from Block 5, Item 20b of your Form 471, if a contract expiration date was provided on your Form 471.

SITE IDENTIFIER: The Entity Number listed in Form 471, Block 5, Item 22a for "site specific" FRNs only.

NUMBER OF MONTHS RECURRING SERVICE PROVIDED IN FUNDING YEAR: The number of months of service that has been approved for the funding year, for recurring services.

ANNUAL PRE-DISCOUNT AMOUNT FOR ELIGIBLE RECURRING CHARGES: Eligible monthly pre-discount amount approved for recurring charges multiplied by number of months of recurring service approved for the funding year.

ANNUAL PRE-DISCOUNT AMOUNT FOR ELIGIBLE NON-RECURRING CHARGES: Annual eligible non-recurring charges approved for the funding year.

PRE-DISCOUNT AMOUNT: Amount in Form 471, Block 5, Item 23I, as determined through the application review process.

DISCOUNT PERCENTAGE APPROVED BY USAC: The discount rate that USAC approved for this service.

FUNDING COMMITMENT DECISION: The total amount of funding that USAC has reserved to reimburse your service provider for the approved discounts for this service for this funding year. It is important that both you and your service provider recognize that USAC should be invoiced and that disbursement of funds will be made only for eligible, approved services actually rendered.

FUNDING COMMITMENT DECISION EXPLANATION: This entry provides an explanation of the amount in the "Funding Commitment Decision."

FCDL DATE: The date of this Funding Commitment Decision Letter (FCDL).

WAVE NUMBER: The wave number assigned to FCDLs issued on this date.

LAST ALLOWABLE DATE FOR DELIVERY AND INSTALLATION FOR NON-RECURRING SERVICES: The last date approved by the FCC for delivery and installation of eligible non-recurring services (e.g., equipment). (The last allowable date for delivery and installation of recurring services is always the last day of the fund year, that is, June 30, 2007 for Funding Year 2006.)

FUNDING COMMITMENT REPORT
Billed Entity Name: WINTON WOODS CITY SCH DISTRICT
BEN: 129887
Funding Year: 2006

Form 471 Application Number: (499117)
Funding Request Number: 1373755
Funding Status: Not Funded
Category of Service: Telecommunications Service
Form 470 Application Number: (467190000481691)
SPIN: 143024403
Service Provider Name: Hamilton Clermont Cooperative Association of Board
Contract Number: HCCAVM00106
Billing Account Number: N/A
Service Start Date: 07/01/2006
Contract Expiration Date: 06/30/2008
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$36,360.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$36,360.00
Discount Percentage Approved by the USAC: N/A
Funding Commitment Decision: \$0.00 - Svcs. not requested on F. 470
Funding Commitment Decision Explanation: The category of service was changed from Internet Access to Telecom Services in accordance with program rules. The 470 cited did not include service of this type; therefore it does not meet the 28 day competitive bidding requirement.

FCDL Date: 10/24/2006

Wave Number: 027

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2007

Funding Request Number: 1373758

Funding Status: Funded

Category of Service: Internet Access

Form 470 Application Number: 467190000481691

SPIN: 143024403

Service Provider Name: Hamilton Clermont Cooperative Association of Board

Contract Number: HCCA 11504

Billing Account Number: N/A

Service Start Date: 07/01/2006

Contract Expiration Date: 06/30/2007

Number of Months Recurring Service Provided in Funding Year: 12

Annual Pre-discount Amount for Eligible Recurring Charges: \$50,499.96

Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00

Pre-discount Amount: \$50,499.96

Discount Percentage Approved by the USAC: 51%

Funding Commitment Decision: \$25,754.98 - FRN approved as submitted

FCDL Date: 10/24/2006

Wave Number: 027

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2007

*Eligible Services
with
pg 53*

888-203-8100

*① Submit
question
online
will email
back.*

IMPORTANT REMINDERS & DEADLINES

Form 471 Application Number: 499117

Billed Entity Number: 129887

Name of Billed Entity: WINTON WOODS CITY SCH DISTRICT

YOUR NEXT STEPS IN THE APPLICATION PROCESS: Following are steps to assist you through the application process. Web page URLs are included to facilitate access to additional information on USAC's website.

REVIEW TECHNOLOGY PLANNING REQUIREMENTS - Program rules require a technology plan based on an assessment of needs and that those plans be approved before the start of services. See "Develop a Technology Plan" at <http://www.usac.org/sl/applicants/step02/> for information about technology plan requirements and approvals.

REVIEW CHILDREN'S INTERNET PROTECTION ACT (CIPA) REQUIREMENTS - CIPA compliance is required for requests for Internet Access, Internal Connections and Basic Maintenance discounts. For information about CIPA requirements and certifications, see "Children's Internet Protection Act (CIPA)" at <http://www.usac.org/sl/applicants/step10/cipa.aspx> for information about CIPA and its requirements.

FILE FORM 486 - You must notify USAC of the start of service, the name of your USAC-certified technology plan approver and your compliance with CIPA on Form 486. See "Begin Receipt of Services" on our website at <http://www.usac.org/sl/applicants/step10/>.

FORM 486 DEADLINE - The Form 486 must be postmarked no later than 120 days after the Service Start Date featured in the Form 486 Notification Letter or no later than 120 days after the date of the Funding Commitment Decision Letter, whichever is later. Use the "Deadlines" calculator on our website at <http://www.usac.org/sl/tools/deadlines> to calculate your Form 486 deadline.

INVOICE USAC - After eligible services have been delivered, invoice USAC to request reimbursement of approved discounts. For information about requesting reimbursement from USAC, see "Invoice USAC" on our website at <http://www.usac.org/sl/applicants/step11/>.

INVOICE DEADLINE - Invoices must be postmarked no later than 120 days after the last date to receive service - including extensions - or 120 days after the date of the Form 486 Notification Letter, whichever is later. Use the "Deadlines" calculator on our website at <http://www.usac.org/sl/tools/deadlines> to calculate your invoice deadline.

DOCUMENT RETENTION - Documents related to the receipt of discounts must be retained for at least five years after the last day of service delivered. For more information, see "Document Retention Requirements" on our website at <http://www.usac.org/sl/about/document-retention-requirements/default.aspx>.

OBLIGATION TO PAY NON-DISCOUNT PORTION/FREE SERVICES ADVISORY - Applicants are required to pay the non-discount portion of the cost of the products and/or services. Service providers are required to bill applicants for the non-discount portion. For further information, see "Obligation to Pay Non-Discount Portion" on our website at <http://www.usac.org/sl/applicants/step11/obligation-to-pay.aspx> and "Free Services Advisory" at <http://www.usac.org/sl/applicants/step06/free-services-advisory.aspx>.

SUSPENSION AND DEBARMENT - Persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the Schools and Libraries Program are subject to suspension and debarment from the program. More information and a current list of persons who have been suspended or debarred is posted in "Suspensions and Debarments" on our website at <http://www.usac.org/sl/about/suspensions-debarments.aspx>.

COMPLETE PROGRAM INFORMATION - including more information on these reminders - is posted to the Schools and Libraries area of USAC's website at www.usac.org/sl. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

EXHIBIT B

Schools and Libraries Universal Service Description of Services Requested and Certification Form 470

Estimated Average Burden Hours Per Response: 4 hours

This form is designed to help you describe the eligible telecommunications-related services you seek so that this data can be posted on the Fund Administrator Web Site and interested service providers can identify you as a potential customer and compete to serve you.

Please read instructions before beginning this application. (You can also file online at www.sl.universalservice.org)

2004

Applicant's Form Identifier (Create your own code to identify THIS Form 470)

0 4 0 5 I N T E R

Form 470 Application #:

467190000481691

(To be inserted by Fund Administrator)

Block 1: Applicant Address and Identifications

1 Name of Applicant

W I N T O N W O O D S C I T Y S C H D I S T R I C T

2 Funding Year

July 1, 2 0 0 4 through June 30, 2 0 0 5

3 Your Entity Number

1 2 9 8 8 7

4a Street Address, P.O. Box, or Route Number

1 2 1 5 W K E M P E R R D

City

C I N C I N N A T I

State

Zip Code

OH 4 5 2 4 0 1 6 1 7

b Telephone Number

5 1 3 8 2 5 5 7 0 0 Ext

c Fax Number

5 1 3 8 2 5 5 2 4 1

d E-mail Address

5 Type of Application

Individual School (individual public or non-public school)

☒ School District (LEA; public or non-public [e.g. diocesan] local district representing multiple schools)

Library (including library system, library branch or library consortium applying as a library)

Consortium (intermediate service agencies, states, state networks, special consortia)



Entity Number 129887 Applicant's Form Identifier 0405INTER
Contact Person Rhonda L Hobbs Contact Telephone Number (513) 619-2350

Block 1: Applicant Address and Identifications (continued)

6a Contact Person's Name

R h o n d a L H o b b s

First, fill in every item of the Contact Person's information below that is different from Item 4, above. Then check the box next to the preferred mode of contact. (At least one box MUST be checked.)

b Street Address, P.O. Box, or Route Number

8 2 5 W a y c r o s s R o a d

City

C I N C I N N A T I

State

Zip Code

O H 4 5 2 4 0 1 6 1 7

☐ **c** Telephone Number

5 1 3 6 1 9 2 3 5 0 Ext

☐ **d** Fax Number

☒ **e** E-mail Address

h o b b s . r h o n d a @ w i n t o n w o o d s . o r g

Block 2: Summary Description of Needs or Services Requested

7 This Form 470 describes (check all that apply):

- a** Tariffed services - telecommunications services, purchased at regulated prices, for which the applicant has no signed, written contract. A new Form 470 must be filed for tariffed services for each funding year.
- b** ☒ Month-to-month services for which the applicant has no signed, written contract. A new Form 470 must be filed for these services for each funding year.
- c** ☒ Services for which a new written contract is sought for the funding year in Item 2.
- d** A multi-year contract signed on or before 7/10/97 but for which no Form 470 has been filed in a previous program year.

NOTE: Services that are covered by a signed, written contract executed pursuant to posting of a Form 470 in a previous program year OR a contract signed on/before 7/10/97 and reported on a Form 470 in a previous year as an existing contract do NOT require filing of a Form 470.

What kinds of service are you seeking: Telecommunications Services, Internet Access, or Internal Connections? Refer to the Eligible Services List at www.sl.universalservice.org for examples. Check the relevant category or categories (8, 9, and/or 10 below), and answer the questions in each category you select.



Entity Number	129887	Applicant's Form Identifier	0405INTER
Contact Person	Rhonda L Hobbs	Contact Telephone Number	(513) 619-2350

Block 2: Summary Description of Needs or Services Requested (Continued)

8 Telecommunications Services

Item 8, page

1 of

1

Do you have a Request for Proposal (RFP) that specifies the services you are seeking?

a YES, I have an RFP. It is available on the Web at:

or via (check one)

the Contact Person in Item 6 or

the contact listed in Item 11.

b NO, I do not have an RFP for these services.

If you answered NO, you must list below the Telecommunications Services you seek. Specify each service or function (e.g., local voice service) and quantity and/or capacity (e.g., 20 existing lines plus 10 new ones). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Telecommunications Services. Remember that only eligible telecommunications providers can provide these services under the universal service support mechanism. Add additional pages if needed.

Service or Function

1) Quantity and/or Capacity

Service or Function

2) Quantity and/or Capacity

Service or Function

3) Quantity and/or Capacity

Service or Function

4) Quantity and/or Capacity

Service or Function

5) Quantity and/or Capacity



Entity Number	129887	Applicant's Form Identifier	0405INTER
Contact Person	Rhonda L Hobbs	Contact Telephone Number	(513) 619-2350

Block 2: Summary Description of Needs or Services Requested (Continued)

9 Internet Access

Item 9, page

1 of

1

Do you have a Request for Proposal (RFP) that specifies the services you are seeking?

a YES, I have an RFP. It is available on the Web at:

or via (check one)

the Contact Person in Item 6 or

the contact listed in Item 11.

b ☒ NO, I do not have an RFP for these services.

If you answered NO, you must list below the Internet Access services you seek. Specify each service or function (e.g., monthly Internet service) and quantity and/or capacity (e.g., for 500 users). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internet Access services. Add additional pages if needed.

Service or Function

I n t e r n e t S e r v i c e

1)

Quantity and/or Capacity

7 I n s t r u c t i o n a l B u i l d i n g s

Service or Function

E m a i l A c c o u n t s a n d S e r v i c e s

2)

Quantity and/or Capacity

7 I n s t r u c t i o n a l B u i l d i n g s

Service or Function

V o i c e m a i l S e r v i c e s

3)

Quantity and/or Capacity

7 I n s t r u c t i o n a l B u i l d i n g s

Service or Function

4)

Quantity and/or Capacity

Service or Function

5)

Quantity and/or Capacity



Entity Number	129887	Applicant's Form Identifier	0405INTER
Contact Person	Rhonda L Hobbs	Contact Telephone Number	(513) 619-2350

Block 2: Summary Description of Needs or Services Requested (Continued)

10 Internal Connections

Item 10, page

1 of

1

Do you have a Request for Proposal (RFP) that specifies the services you are seeking?

a YES, I have an RFP. It is available on the Web at:

or via (check one)

the Contact Person in Item 6 or

the contact listed in Item 11.

b NO, I do not have an RFP for these services.

If you answered NO, you must list below the Internal Connections services you seek. Specify each service or function (e.g., local area network) and quantity and/or capacity (e.g., connecting 10 rooms and 300 computers at 56kps or better). See the Eligible Services List at www.sl.universalservice.org for examples of eligible Internal Connections services. Add additional pages if needed.

Service or Function

1)

Quantity and/or Capacity

Service or Function

2)

Quantity and/or Capacity

Service or Function

3)

Quantity and/or Capacity

Service or Function

4)

Quantity and/or Capacity

Service or Function

5)

Quantity and/or Capacity



Entity Number 129887 Applicant's Form Identifier 0405INTER
Contact Person Rhonda L Hobbs Contact Telephone Number (513) 619-2350

Block 2: Summary Description of Needs or Services Requested (Continued)

- 11 (Optional) Please name the person on your staff or project who can provide additional technical details or answer specific questions from service providers about the services you are seeking. This need not be the contact person listed in Item 6 nor the signer of this form.

Name

Title

Telephone Number

Ext

Fax Number

E-mail Address

- 12 * Check here if there are any restrictions imposed by state or local laws or regulations on how or when providers may contact you or on other bidding procedures. Please describe below any such restrictions or procedures, and/or provide a Web address where they are posted and a contact name and telephone number for service providers without Internet access.

The State of Ohio requires that for purchases that will become fixtures that a notice in a newspaper of general circulation appear in 2 weekly editions advertising the bid prior to the contract.

- 13 If you intend to enter into a multi-year contract based on this posting or a contract featuring an option for voluntary extensions, you may provide that information below. If you have plans to purchase additional services in future years, or expect to seek new contracts for existing services, summarize below (including the likely timeframes).



Entity Number	129887	Applicant's Form Identifier	0405INTER
Contact Person	Rhonda L Hobbs	Contact Telephone Number	(513) 619-2350

Block 3: Technology Assessment

- 14 Basic telephone service only:** If your application is for basic local and/or long distance telephone service (wireline or wireless) only, check this box and skip to Item 16.
- 15** Although the following services and facilities are ineligible for support, they are usually necessary to make effective use of the eligible services requested in this application. Unless you indicated in Item 14 that your application is ONLY for basic telephone service, you must check at least one box in a through e. You may provide details for purchases being sought.
- Desktop software: Software required
- a. ☒ has been purchased; and/or ☒ is being sought.
- Electrical systems:
- b. ☒ adequate electrical capacity is in place or ☒ upgrading for electrical capacity is being sought.
has already been arranged; and/or
- Computers: a sufficient quantity of computers
- c. ☒ has been purchased; and/or ☒ is being sought.
- Computer hardware maintenance: adequate arrangements
- d. ☒ have been made; and/or ☒ are being sought.
- Staff development:
- e. ☒ all staff have had an appropriate level of ☒ training is being sought.
training/additional training has already
been scheduled; and/or
- f. Additional details: Use this space to provide additional details to help providers to identify the services you desire.

Block 4: Recipients of Service

16 Eligible Entities That Will Receive Services:

Check the ONE choice (a, b or c) that best describes this application and the eligible entities that will receive the services described in this application. You will then list in Item 17 the entity/entities that will pay the bills for these services.

a ☐ Individual school or single-site library.

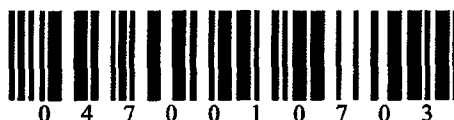
b ☐ Statewide application for (enter 2-letter state code) representing (check all that apply):

All public schools/districts in the state.

All non-public schools in the state.

All libraries in the state.

Does your statewide application include INELIGIBLE entities? No Yes. If yes, complete item 18.



Entity Number	129887	Applicant's Form Identifier	0405INTER
Contact Person	Rhonda L Hobbs	Contact Telephone Number	(513) 619-2350

Block 4: Recipients of Service (Continued)

16c ☒ School district, library system, or consortium application to serve multiple eligible entities:

Item 16c, page 1 of 1

Number of eligible entities 7

For these eligible entities, please provide the following:

Area Codes (list each unique area code)	Prefixes associated with each area code (first 3 digits of 7-digit phone number)
1) 5 1 3	
2)	
3)	
4)	
5)	
6)	
7)	
8)	
9)	
10)	
11)	
12)	
13)	
14)	

Does your application include any INELIGIBLE entities? ☒ No Yes. If yes, complete item 18.



Entity Number	<u>129887</u>	Applicant's Form Identifier	<u>0405INTER</u>
Contact Person	<u>Rhonda L Hobbs</u>	Contact Telephone Number	<u>(513) 619-2350</u>

Block 4: Recipients of Service (Continued)

17 Billed Entities

List the entity/entities that will be paying the bills directly to the provider for the services requested in this application. These are known as Billed Entities. At least one line of this item must be completed. Attach additional sheets if necessary.

Item 17, page 1 of 1

Entity Number	Entity
1) 1 2 9 8 8 7	W I N T O N W O O D S C I T Y S C H D I S
2)	
3)	
4)	
5)	
6)	
7)	
8)	
9)	
10)	
11)	
12)	
13)	
14)	
15)	
16)	
17)	
18)	
19)	
20)	



Entity Number	<u>129887</u>	Applicant's Form Identifier	<u>0405INTER</u>
Contact Person	<u>Rhonda L Hobbs</u>	Contact Telephone Number	<u>(513) 619-2350</u>

Block 4: Recipients of Service (Continued)

18 Ineligible Participating Entities: Does your application also seek bids on services to entities that are not eligible for the Universal Service Program? If so, list those entities here **Item 18, page** 1 of 1 (attach pages if needed):

Ineligible Participating Entity	Area Code and Prefix
1)	
2)	
3)	
4)	
5)	
6)	
7)	
8)	
9)	
10)	
11)	
12)	
13)	
14)	
15)	
16)	
17)	
18)	



Entity Number	129887	Applicant's Form Identifier	0405INTER
Contact Person	Rhonda L Hobbs	Contact Telephone Number	(513) 619-2350

Block 5: Certification and Signature

19 The applicant includes: (Check one or both.)

a ☒ schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38), that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or

b libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to elementary and secondary schools, colleges, and universities).

20 All of the individual schools, libraries, and library consortia receiving services under this application are covered by:

a ☒ individual technology plans for using the services requested in the application; and/or

b higher-level technology plans for using the services requested in the application; or

c no technology plan needed; application requests basic local and/or long distance telephone service only.

21 Status of technology plans (if representing multiple entities with mixed technology plan status, check both a and b):

a ☒ technology plan(s) has/have been approved by a state or other authorized body.

b technology plan(s) will be approved by a state or other authorized body.

c no technology plan needed; application requests basic local and/or long distance telephone service only.

22 I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

23 I recognize that support under this support mechanism is conditional upon the school(s) or library(ies) I represent securing access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to use the services purchased effectively.

24 I certify that I am authorized to submit this request on behalf of the above-named entities, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

25 Signature of authorized person	26 Date
-----------------------------------	---------

27 Printed name of authorized person: D r . C a m i l l e A . N a s b e

28 Title or position of authorized person: S u p e r i n t e n d e n t

29a Street Address, P.O. Box, or Route Number: 1 2 1 5 W K e m p e r R o a d

City: C i n c i n n a t i

State: O H Zip Code: 4 5 2 4 0

29b Telephone number of authorized person: 5 1 3 6 1 9 2 3 0 0 ext. 29c Fax number of authorized person

29d E-mail address of authorized person: n a s b e . c a m i l l e @ w i n t o n w o o d s . o r g

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

Service provider involvement with preparation or certification of a Form 470 can taint the competitive bidding process and result in the denial of funding requests.

For more information, refer to the "Service Provider Role in Assisting Customers" at www.sl.universalservice.org/vendor/manual/chapter5.doc or call the Client Service Bureau at 1-888-203-8100.



Entity Number	129887	Applicant's Form Identifier	0405INTER
Contact Person	Rhonda L Hobbs	Contact Telephone Number	(513) 619-2350

Block 5: Certification and Signature (Continued)

NOTICE: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Description of Services Requested and Certification Form (FCC Form 470) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, information provided in or submitted with this form or in response to subsequent inquiries may also be subject to disclosure consistent with the Communications Act of 1934, FCC regulations, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law.

If you owe a past due debt to the federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

Please submit this form to:

SLD-Form 470
P.O. Box 7026
Lawrence, Kansas 66044-7026
1-888-203-8100

For express delivery services or U.S. Postal Service, Return Receipt Requested, mail this form to:

SLD-Form 470
c/o Ms. Smith
3833 Greenway Drive
Lawrence, Kansas 66046
1-888-203-8100



EXHIBIT C

FCC Form 471

Do not write in this area.

Appro

**Schools and Libraries Universal Service
Description of Services Ordered and Certification Form 471**

Estimated Average Burden Hours per Response: 4 hours

This form asks schools and libraries to list the eligible telecommunications-related services they have ordered and estimate the annual charges for the services. The Fund Administrator can set aside sufficient support to reimburse providers for services.

Please read instructions before beginning this application. (You can also file online at www.sl.universalservice.org.)

The instructions include information on the deadlines for filing this application.

Applicant's Form Identifier

(Create your own code to identify THIS form 471) 0607-INTER

Form 471 Application#

(To be assigned by administrator)

499117

Block 1: Billed Entity Information (The "Billed Entity" is the entity paying the bills for the service listed on this form.)

1 a	Name of Billed Entity	WINTON WOODS CITY SCH DISTRICT	
2 a	Funding Year: July 1, 2006 Through June 30: 2007	Billed Entity Number: 129887	
4 a	Street Address, P.O. Box, or Routing Number	1215 W KEMPER RD	
	City	CINCINNATI	
	State	OH	Zip Code 45240 1617
5 a	Type of Application	<input type="checkbox"/> Individual School (individual public or non-public school) <input checked="" type="checkbox"/> School District (LEA; public or non-public [e.g. diocesan] local district representing multiple schools) <input type="checkbox"/> Library (including library system, library outlet/branch or library consortium as defined under LSTA) <input type="checkbox"/> Consortium <input type="checkbox"/> Check here if any members of this consortium are ineligible or non-governmental entities	
6	Contact Person's Name	Rhonda Hobbs	
First, if the Contact Person's Street Address is the same as in Item 4, check this box. <input type="checkbox"/> If not, please complete the entries for the Street Address.			
b	Street Address, P.O. Box, or Routing Number	825 Waycross Road	
	City	CINCINNATI	
	State	OH	Zip Code 45240 1617

Page 1 of 7



FCC Form 471 - N

Entity Number	<u>129887</u>	Applicant's Form Identifier	<u>0607-INTER</u>
Contact Person	<u>Rhonda Hobbs</u>	Phone Number	<u>513-619-2350</u>

This information will facilitate the processing of your applications. Please complete all rows that apply to services for which you are requesting discount information on the FIRST Form 471 you file, to encompass this and all other Forms 471 you will file for this funding year. You need not complete this information on subsequent Forms 471. Provide your best estimates for the services ordered across ALL of your Forms 471.

Schools/school districts complete Item 7. Libraries complete Item 8. Consortia complete Item 7 and/or Item 8.

Block 2: Impact of Services Ordered on Schools

IF THIS APPLICATION INCLUDES SCHOOLS...		BEFORE ORDER
7a	Number of students to be served	
d	Direct broadband services: Number of buildings served at the following speeds:	
	Less than 10 mbps	0
	Between 10 mbps and 200 mbps	0
	Greater than 200 mbps	7
e	Direct connections to the Internet: Number of drops	264
f	Number of classrooms with Internet access	264
g	Number of computers or other devices with Internet access	1300

Block 3: Impact of Services Ordered on Libraries

NOT APPLICABLE AS THIS APPLICATION IS FOR DISTRICT

Worksheet A No: 731125

Student Count: 4156

Weighted Product (Sum. Column 8): 2133

Shared Discount: 5

1. School Name: BEECHWOODS ELEMENTARY SCHOOL

2. Entity Number: 49817 NCES: 04408 01015

3. Rural/Urban: Urban

4. Student Count: 394

5. NSLP Students: 96

6. NSLP Students/Students: 24.365%

7. Discount: 50%

8. Weighted Product: 197

9. Pre-K/Adult Ed/Juv: N

10. Alt Disc Mech: N

1. School Name: CAMERON PARK ELEMENTARY SCHOOL

2. Entity Number: 49983 NCES: 04408 01016

3. Rural/Urban: Urban

4. Student Count: 430

5. NSLP Students: 146

6. NSLP Students/Students: 33.953%

7. Discount: 50%

8. Weighted Product: 215

9. Pre-K/Adult Ed/Juv: N

10. Alt Disc Mech: N

1. School Name: LAKESIDE ELEMENTARY SCHOOL

2. Entity Number: 49902 NCES: 04408 01024

3. Rural/Urban: Urban

4. Student Count: 500

5. NSLP Students: 100

6. NSLP Students/Students: 20.000%

7. Discount: 50%

8. Weighted Product: 250

9. Pre-K/Adult Ed/Juv: N

10. Alt Disc Mech: N

1. School Name: WAYCROSS ELEMENTARY SCHOOL

2. Entity Number: 49980 NCES: 04408 00588

3. Rural/Urban: Urban

4. Student Count: 485

5. NSLP Students: 293

6. NSLP Students/Students: 60.412%

7. Discount: 80%

8. Weighted Product: 388

9. Pre-K/Adult Ed/Juv: N

10. Alt Disc Mech: N

1. School Name: WINTON FOREST ELEMENTARY SCH
 2. Entity Number: 49979 NCES: 04408 01025
 3. Rural/Urban: Urban
 4. Student Count: 369 5. NSLP Students: 133 6. NSLP Students/Students: 36.043%
 7. Discount: 60% 8. Weighted Product: 221.4
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

1. School Name: WINTON WOODS HIGH SCHOOL
 2. Entity Number: 49977 NCES: 04408 01018
 3. Rural/Urban: Urban
 4. Student Count: 1274 5. NSLP Students: 174 6. NSLP Students/Students: 13.657%
 7. Discount: 40% 8. Weighted Product: 509.6
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

1. School Name: WINTON WOODS MIDDLE SCHOOL
 2. Entity Number: 49819 NCES: 04408 01021
 3. Rural/Urban: Urban
 4. Student Count: 704 5. NSLP Students: 198 6. NSLP Students/Students: 28.125%
 7. Discount: 50% 8. Weighted Product: 352
 9. Pre-K/Adult Ed/Juv: N 10. Alt Disc Mech: N

Block 5: Discount Funding Request(s)

FRN: 1373755 FCDL Date: 10/24/2006	
10. Original FRN:	
11. Category of Service: Telecommunications Service	12. 470 Application Number: 467190000481691
13. SPIN: 143024403	14. Service Provider Name: Hamilton Clermont Cooperative Association of Boards of Ed
15a. Non-Contracted tariffed/Month to Month Service:	15b. Contract Number: HCCAVM00106
15c. Covered under State Master Contract:	15d. FRN from Previous Year: 1163376
16a. Billing Account Number:	16b. Multiple Billing Account Numbers?:
17. Allowable Contract Date: 01/09/2004	18. Contract Award Date: 01/12/2004
19a. Service Start Date: 07/01/2006	19b. Service End Date:
20. Contract Expiration Date: 06/30/2008	
21. Attachment #: 0607-Internet	22. Block 4 Worksheet No.: 731125
23a. Monthly Charges: \$3,030.00	23b. Ineligible monthly amt.: \$.00
23c. Eligible monthly amt.: \$3,030.00	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$36,360.00	
23f. Annual non-recurring (one-time) charges: 0 23g. Ineligible non-recurring amt.: 0	
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00	
23i. Total program year pre-discount amount (23e + 23h): \$36,360.00	
23j. % discount (from Block 4): 51	
23k. Funding Commitment Request (23i x 23j): \$18,543.60	

FRN: 1373758 FCDL Date: 10/24/2006	
10. Original FRN:	
11. Category of Service: Internet Access	12. 470 Application Number: 467190000481691
13. SPIN: 143024403	14. Service Provider Name: Hamilton Clermont Cooperative Association of Boards of Ed

15a. Non-Contracted tariffed/Month to Month Service: N	15b. Contract Number: HCCA 11504
15c. Covered under State Master Contract: N	15d. FRN from Previous Year: 1163539
16a. Billing Account Number:	16b. Multiple Billing Account Numbers?: N
17. Allowable Contract Date: 01/09/2004	18. Contract Award Date: 01/12/2004
19a. Service Start Date: 07/01/2006	19b. Service End Date:
20. Contract Expiration Date: 06/30/2007	
21. Attachment #: 0607-Internet2	22. Block 4 Worksheet No.: 731125
23a. Monthly Charges: \$4,208.33	23b. Ineligible monthly amt.: \$.00
23c. Eligible monthly amt.: \$4,208.33	23d. Number of months of service: 12
23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$50,499.96	
23f. Annual non-recurring (one-time) charges: 0	23g. Ineligible non-recurring amt.: 0
23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00	
23i. Total program year pre-discount amount (23e + 23h): \$50,499.96	
23j. % discount (from Block 4): 51	
23k. Funding Commitment Request (23i x 23j): \$25,754.98	

Block 6: Certifications and Signature

Application ID:499117

Do not write in this area.

Entity Number	129887	Applicant's Form Identifier	0607-INTER
Contact Person	Rhonda Hobbs	Phone Number	513-619-2350

Block 6: Certifications and Signature

24. ☒ I certify that the entities listed in Block 4 of this application are eligible for support because they are: (check one or both)
- a. ☒ schools under the statutory definitions of elementary and secondary schools found in the **No Child Left Behind Act of 2001, 20 U.S.C. Secs. 7801(18) and (38)**, that do not operate as for-profit businesses, and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a State library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools including, but not limited to elementary, secondary schools, colleges, or universities
25. ☒ I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed in this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

a.	Total funding year pre-discount amount on this Form 471 (Add the entities from Item 23i on all Block 5 Discount Funding Requests.)	\$86,859.96
b.	Total funding commitment request amount on this Form 471 (Add the entities from Items 23K on all Block 5 Discount Funding Requests.)	\$44,298.58
c.	Total applicant non-discount share (Subtract Item 25b from Item 25a.)	\$42,561.38
d.	Total budgeted amount allocated to resources not eligible for E-rate support	\$0.00

- e. Total amount necessary for the applicant to pay the non-discount share of the services requested on this application AND to secure access to the resources necessary to make effective use of the discounts. (Add Items 25c and 25d.) **\$42,561.38**
- f. ☐ Check this box if you are receiving any of the funds in Item 25e directly from a service provider listed on any Forms 471 filed by this Billed Entity for this funding year, or if a service provider listed on any of the Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds in Items 25e.

26. ☒ I certify that all of the schools and libraries or library consortia listed in Block 4 of this application are covered by technology plans that are written, that cover all 12 months of the funding year, and that have been or will be approved by a state or other authorized body, and an SLD-certified technology plan approver, prior to the commencement of service. The plans are written at the following level(s):
- a. ☒ an individual technology plan for using the services requested in this application; and/or
- b. ☐ higher-level technology plan(s) for using the services requested in this application; or
- c. ☐ no technology plan needed; applying for basic local, cellular, PCS, and/or long distance telephone service and/or voice mail only.

27. ☒ I certify that I posted my Form 470 and (if applicable) made my RFP available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology plan goals.



28. ☒ I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.
29. ☒ I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. Sec. 54.500(k). Additionally, I certify that the Billed Entity has not received anything of value or a promise of anything of value, other than services and equipment requested under this form, from the service provider(s) or any representative or agent thereof or any consultant in connection with this request for services.
30. ☒ I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts covering all of the services listed on this Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.
31. ☒ I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.
32. ☒ I certify that I will retain required documents for a period of at least five years after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.
33. ☒ I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of this program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under the Title 18 of the United States Code, 18 U.S.C. Sec. 1001 and civil violations of the False Claims Act.
34. ☒ I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.
35. ☒ I certify that if any of the Funding Requests on this Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the cost of the contract to eligible and ineligible companies as required by the Commission's rules at 47 C.F.R. Sec. 54.504(g)(1),(2).
36. ☒ I certify that this funding request does not constitute a request for internal connections services, except basic maintenance services, in violation of the Commission requirement that eligible entities are not eligible for such support more than twice every five funding years beginning with Funding Year 2005 as required by the Commission's rules at 47 C.F.R. Sec. 54.506(c).
37. ☒ I certify that the non-discounted portion of the costs for eligible services will not be paid by the service provider. The pre-discount costs of eligible services features on this Form 471 are net of any rebates or discounts offered by the service provider. I acknowledge that, for the purpose of this rule, the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.

38. Signature of authorized person

39. Signature Date 1/13/06

The Americans with Disabilities Act, the Individuals with Disabilities Education Act and the Rehabilitation Act may impose obligations on entities to make the services purchased with these discounts accessible to and usable by people with disabilities.

NOTICE: Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public.

If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized.

If you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq.

Public reporting burden for this collection of information is estimated to average 4 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554.

Please submit this form to:

**SLD-Form 471
P.O. Box 7026
Lawrence, Kansas 66044-7026**

**For express delivery services or U.S. Postal Service, Return Receipt Requested,
mail this form to:**

**SLD Forms
ATTN: SLD Form 471
3833 Greenway Drive
Lawrence, Kansas 66046
(888) 203-8100**

Print

<< Previous

EXHIBIT D



80 South Jefferson Road
Whippany, New Jersey 07981
Fax: 973-599-6579

Universal Service Administrative Company
Schools & Libraries

FAX TRANSMISSION COVER SHEET

To: Rhonda Hobbs
Fax: 1-513-6192362
Subject: ERate App# 499117(A.S.)
From: PIATeam8
Date: July 27, 2006
Time: 11:26:51 AM

YOU SHOULD RECEIVE 4 PAGE(S), INCLUDING THIS COVER SHEET. IF YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL THE CONTACT SPECIFIED BELOW.

Please see the attached.

Privilege and Confidentiality Notice

The information in this telecopy is intended for the named recipients only. It may contain information that is privileged, confidential or otherwise protected from disclosure. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action in reliance on the contents of this telecopied material is strictly prohibited. If you have received the telecopy in error, please notify us by telephone immediately and mail the original to us at the above address. Thank you.



Schools and Libraries Division

Jul 27, 2006

Rhonda Hobbs

WINTON WOODS CITY SCH DISTRICT

Telephone:

(513) 6192350

Application Number

499117

Response Due Date: <Insert Response Due Date>

As we discussed in our conversation, we are in the process of reviewing all Funding Year 2006 Form 471 applications for schools and libraries discounts to ensure that they are in compliance with the rules of the Universal Service program. I am currently in the process of reviewing your Funding Year 2006 Form 471 Application. To complete my review I need some additional information. The information needed to complete the PIA Review is listed below.

1. For FRN(s) 1373755, the documentation provided in the Item 21 Attachments is not sufficient to determine the eligibility of your request. The documentation does not clearly identify the products/services being requested in this FRN. Please provide more detailed documentation that identifies the actual products and services being requested. If your documentation does not identify the specific products and services such as make, model, description of the product/service being delivered, you will need to contact your vendor and request such documentation. The vendor should be able to provide you with detailed documentation.

Any documentation provided should clearly identify any ineligible charges that were cost allocated out of your request. If you are unable to justify the eligibility of charges requested on your Form 471, the request may be reduced or denied.

***THE DOCUMENTATION PROVIDED MUST BE A BILL CONTRACT OR QUOTE TO SUPPORT \$3030/MO AND IF CANNOT BE SUPPORTED, PLEASE REQUEST TO REDUCE TO THE AMOUNT THAT CAN BE SUPPORTED BY THE DOUMENTATION.**

2. For FRN(s) 1373758, the documentation provided in the Item 21 Attachments is not sufficient to determine the eligibility of your request. The documentation does not clearly identify the products/services being requested in this FRN. Please provide more detailed documentation that identifies the actual products and services being requested.

If your documentation does not identify the specific products and services such as make, model, description of the product/service being delivered, you will need to contact your vendor and request such documentation. The vendor should be able to provide you with detailed documentation.

Any documentation provided should clearly identify any ineligible charges that were cost allocated out of your request. If you are unable to justify the eligibility of charges requested on your Form 471, the request may be reduced or denied.

***THE DOCUMENTATION PROVIDED MUST BE A BILL CONTRACT OR QUOTE TO SUPPORT \$4208.33/MO AND IF CANNOT BE SUPPORTED, PLEASE REQUEST TO REDUCE TO THE AMOUNT THAT CAN BE SUPPORTED BY THE DOUMENTATION.**

Please fax or e-mail the requested information to my attention. If you have any questions, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review. **Failure to do so may result in a reduction or denial of funding.** If you need additional time to prepare your response, please let me know as soon as possible. If you are unable to provide the requested information because your school has closed or will shortly close for summer break, let me know when you will be available to respond to these questions.

Please advise me if the Contact Person on the application(s) has changed from that on the original application. This change must include the Form 471 application number(s) and be signed by the original application's Contact Person, the original application's Authorized Person or a school official (with name and title provided).

Should you wish to cancel this Form 471 application, or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s); along with the application number and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service program.

Sincerely,

Adrian Sewdat

PIA Initial Reviewer

Universal Services Administrative Company Schools & Libraries Division

Voice: 973-581-5371

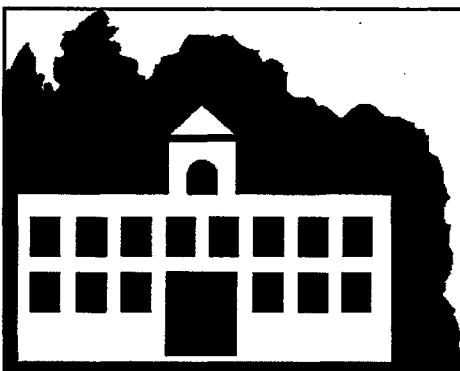
Fax: 973-599-6579

E-Mail: asewdat@SL.UniversalService.org

This message (including any attachments) contains confidential information intended for a specific individual and purpose, and is protected by law. If you are not the intended recipient, you should delete this message. Any disclosure, copying, or distribution of this message, or the taking of any action based on it, is strictly prohibited.

*Please read this letter carefully and provide all requested information. When you send the information please label and separate all information accordingly to their respected FRN and 471 application number. Please make sure all documents that are supposed to be signed are signed by the appropriate school official and the documents provided are readable. Also, please provide a cover letter with your name, phone number, fax number, email address, form 471 application number, and form 471 application name.

EXHIBIT E



WINTON WOODS CITY SCHOOLS

TECHNOLOGY CENTER

825 Waycross Rd.

Cincinnati, OH. 45240

Phone: 513-619-2350

Fax: 513-619-2362

FAX

To: Adrian Sewdat

From: Rhonda Hobbs

Fax: 973-599-6579

Pages: 5

Phone: 973-581-5371

Date: 7-28-06

Attached:

Please find the requested documentation regarding

FRN# 1373755 and

FRN# 1373758.



Schools and Libraries Division

Jul 27, 2006

Rhonda Hobbs

WINTON WOODS CITY SCH DISTRICT

Telephone:

(513) 6192350

Application Number

499117

Response Due Date: <Insert Response Due Date>

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***THE DOCUMENTATION PROVIDED MUST BE A BILL, CONTRACT, OR QUOTE TO SUPPORT \$4283.33/MO AND IF CANNOT BE SUPPORTED, PLEASE REQUEST TO REDUCE TO THE AMOUNT THAT CAN BE SUPPORTED BY THE DOUMENTATION.**

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Thank you for your cooperation and continued support of the Universal Service program.

Sincerely,

Adrian Sewdat

PIA Initial Reviewer

Universal Services Administrative Company Schools & Libraries Division

Voice: 973-581-5371

Fax: 973-599-6579

E-Mail: asewdat@SL.UniversalService.org

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*Please read this letter carefully and provide all requested information. When you send the information please label and separate all information accordingly to their respected FRN and 471 application number. Please make sure all documents that are supposed to be signed are signed by the appropriate school official and the documents provided are readable. Also, please provide a cover letter with your name, phone number, fax number, email address, form 471 application number, and form 471 application name.

*attached
please
find requested
documentation
regarding
FRN # 1373755
? FRN # 137378*



7615 Harrison Avenue Cincinnati, Ohio 45231 513-931-7120

Voicemail Services for Winton Woods City School District provided by Hamilton Clermont Cooperative Association includes the following:

1. Voicemail service for 520 voicemail accounts that allow users to receive voice messages left by callers via email / internet access as well as basic phone voice mail access
2. Support

Please let me know if you have any questions or need more information.

Susan Patrick, Internet Specialist
HCCA
7615 Harrison Avenue
Cincinnati, Ohio 45231
513-728-7913

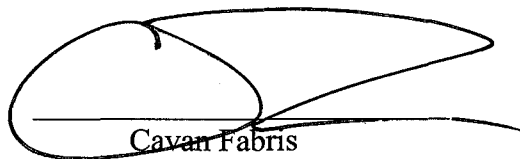
FRN #
1373755

CERTIFICATE OF SERVICE

I, Cavan E. Fabris, hereby declare that copies of the foregoing request for review were delivered by hand or by U.S. mail, this day, December 22, 2006, to the following, as required by section 54.721(c) of the Commission's rules:

David Capozzi
Acting General Counsel
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

Letter of Appeal
Schools and Libraries Division – Correspondence Unit
100 S. Jefferson Rd
P.O. Box 902
Whippany, NJ 07981



Cavan Fabris